

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNION INSURANCE COMPANY)
)
)
Plaintiff,) Case No.: 4:22-cv-01180 AGF
)
)
v.)
)
CSAC, INC., and SADE M.)
CRAWFORD,)
)
Defendants.)

**DEFENDANT CSAC, INC.’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE PLEAD**

Defendant CSAC, Inc. (“CSAC”), by and through its undersigned counsel, respectfully moves this Court for an order extending CSAC’s time to answer or otherwise plead up to and including January 9, 2023. In support of this Motion, CSAC states as follows:

1. Plaintiff commenced this action on November 7, 2022.
2. CSAC was served with a civil summons and Plaintiff’s Complaint on November 10, 2022.
3. CSAC’s current deadline to answer or otherwise respond to Plaintiff’s Complaint is on or before December 1, 2022.
4. In order for CSAC’s counsel to fully investigate and respond to Plaintiff’s Complaint, CSAC respectfully requests a sixty (60) day extension until January 9, 2023, to answer or otherwise respond to Plaintiff’s Complaint.
5. This is the first request for additional time sought by CSAC in this action.
6. This extension is sought in good faith and not for the purposes of delay. Neither party will be prejudiced by this extension.

7. CSAC's counsel communicated with Plaintiff's counsel via email on November 16, 2022, regarding the relief requested herein. Plaintiff's counsel confirmed that Plaintiff does not oppose this motion for extension of time to answer or otherwise plead.

WHEREFORE, for the foregoing reasons, CSAC respectfully requests this Court extend its time to answer or otherwise plead until January 9, 2023.

Dated November 28, 2022

Respectfully submitted,

By: /s/ Charles N. Insler
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Counsel for Defendant CSAC

CERTIFICATE OF SERVICE

I hereby certify that this document was filed with the Court on November 29, 2022.

/s/ Charles N. Insler
Charles N. Insler